

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a)
ADAMSWELLS; and CONSOLIDATED)
TELEPHONE COMPANY d/b/a CTC)
)
 Plaintiff,) No. 1:19-cv-07190
)
 vs.) Judge John Z. Lee
)
 T-MOBILE USA, INC.; and)
 INELIQUENT, INC.)
)
 Defendants.)

AGREED MOTION FOR EXTENSION OF DEADLINES

Plaintiffs Craigville Telephone Co. d/b/a/ AdamsWells Internet Telecom TV and Consolidated Telephone Company d/b/a CTC (collectively, “Plaintiffs”), with the consent and agreement of Defendants, hereby move this Court for an extension of the February 2, 2021 deadline for Plaintiffs to file their Oppositions to Defendants’ Motions to Dismiss the Second Amended Complaint, and a commensurate extension of Defendants’ February 16, 2021 deadline to file Reply briefs, as scheduled by this Court’s December 17, 2020 Docket Entry [ECF No. 95]. In support of their Motion, Plaintiffs state as follows:

1. On December 17, 2020, following a telephonic status conference, the Court issued a Docket Entry [ECF No. 95] setting a briefing schedule for Defendants’ Motions to Dismiss Plaintiffs’ Second Amended Complaint, including a February 2, 2021 deadline for Plaintiffs to file their Oppositions to Defendants’ Motions to Dismiss and February 16, 2021 deadline for Defendants to file Reply briefs (the “Deadlines”).

2. Unfortunately, the Deadlines conflict with a newly predicted severe winter storm that counsel for Plaintiffs expect will result in a significant snowfall in the Washington, DC area, and that will likely interfere with some of Plaintiffs' counsel's access to child care in the day prior to, or of, Plaintiffs' February 2, 2021 opposition brief deadline.

3. Accordingly, Plaintiffs sought Defendants' consent to a three day extension of the Deadline, and Defendants agreed to extending Plaintiff's February 2, 2021 deadline to February 5, 2021, so long as Plaintiffs agree to a commensurate extension of Defendants' February 16, 2021 deadline to February 19, 2021, which Plaintiffs do. A true and accurate copy of the Parties' Stipulated Agreement Concerning Extension of Deadlines (the "Stipulation") is attached hereto as Exhibit A.

4. This motion is made in the interest of justice, will not cause any undue delay in the proceedings, and will not prejudice either party.

WHEREFORE, Plaintiffs respectfully request that this Court issue an order granting the extension of deadlines pursuant to the Stipulation as set forth in the accompanying proposed order attached hereto as Exhibit B.

Dated: January 29, 2021

Respectfully submitted,

/s/ Mia D. D'Andrea

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 29, 2021, I electronically filed the foregoing **AGREED MOTION FOR EXTENSION OF DEADLINES**, with the Clerk of Court using the Court's CM/ECF electronic filing system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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/s/ Mia D. D'Andrea
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